

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR22-109-RSM
)	
Plaintiff,)	
)	MR. GEORGE’S SENTENCING
vs.)	MEMORANDUM
)	
JOEY GEORGE,)	
)	
Defendant.)	

I. INTRODUCTION

Joey David George (“Joey”), an intellectually disabled person whose “cognitive ability” is “in the borderline range with a Full Scale IQ of 72,”¹ and who “demonstrates numerous behaviors commonly associated with Autism Spectrum Disorder (“ASD”),”² through his attorney, respectfully requests that the Court impose a sentence of 12 months and 1 day, followed by 3 years of supervised release with conditions that help him manage his disability and offer him the opportunity to establish stable independent living.

The request is 6 months shorter than the thoughtful recommendation written by the United States Probation Office (“USPO”), which conducted a thorough and complete examination of the nature and circumstances of the offense and Joey’s personal history and characteristics.³ The difference may not mean much in other

¹ PSR ¶ 82.

² PSR ¶ 81.

³ USPO Rec. (dated Dec. 1, 2022).

1 sentencings before this Court, but will be of significant consequence to Joey, who has
 2 never been arrested, charged with a crime, or incarcerated and is currently enduring
 3 unique hardships at the Federal Detention Center (“FDC”) given his disabilities—
 4 disabilities that are not disputed by anyone. The short additional time in jail will allow
 5 the Probation Office to prepare to help Joey manage his disabilities, get services from
 6 the state of Washington, and establish stable independent living.

7 **II. DISCUSSION**

8 **A. Sentencing Framework**

9 The advisory sentencing guidelines are merely “one factor among the § 3553(a)
 10 factors that are to be taken into account in arriving at an appropriate sentence.” *United*
 11 *States v. Carty*, 520 F.3d 984, 991 (9th Cir. 2008). “[T]he history and characteristics of
 12 the defendant” are considered alongside “the nature and circumstances of the offense.”
 13 18 U.S.C. § 3553(a)(1). “The overarching statutory charge for a district court is to
 14 ‘impose a sentence sufficient, but not greater than necessary’ to reflect the seriousness
 15 of the offense, promote respect for the law, and provide just punishment; to afford
 16 adequate deterrence; [and] to protect the public[.]” *Carty*, 520 F.3d at 991.

17 The Presentence Investigation Report (“PSR”) has calculated an advisory
 18 sentencing guidelines total offense level of 16, resulting in a sentencing range of 21 to
 19 27 months. The Probation Office, however, recognizes that the advisory sentencing
 20 guidelines range is too high and has recommended this Court impose a sentence of 18
 21 months of custody to be followed by 3 years of supervised release to “reasonably
 22 address [Joey’s] conduct, ensure the safety of the community, and provide [Joey] with
 23 the necessary correctional treatment he needs.”⁴

24
 25
 26 ⁴ USPO Rec. at 4; *see also* PSR ¶ 83 (Dr. Evan Freedman’s proposed treatment or
 intervention to reduce risks of recidivism).

1 A thorough and fair consideration of all the § 3553(a) factors shows that the
 2 recommendation of 12 months and 1 day in custody and 3 years of supervised release is
 3 merited here.

4 **B. Joey David George's Personal History and Characteristics⁵**

5 Joey's personal history and characteristics weigh strongly in favor of a sentence
 6 of 12 months and a day. Joey was born into and raised in "an undeniably chaotic and
 7 traumatic environment."⁶ Because of his cultural background, he was isolated, removed
 8 from school after finishing elementary school, and taught not to associate with students
 9 from other cultural backgrounds.⁷

10 Through no fault of his own, he was taken out of school and deprived of the
 11 protections provided to him under laws for persons with disabilities.⁸ The consequences
 12 were devastating for him because he lost the opportunity to receive diagnoses for
 13 intellectual disability and ASD early on in his developmental years so that he could
 14 receive services and support from the state.⁹

15 Rather than receive such support, including services from agencies like Child
 16 Protective Services ("CPS")¹⁰ or protection from mandated reporters,¹¹ he was exposed
 17 to unimaginable trauma. As the USPO reports, he received a perfect score on the
 18 Adverse Child Experiences ("ACEs") examination administered by the office, a score
 19 which the Centers for Disease Control and Prevention ("CDC") concludes establishes a

20 _____
 21 ⁵ The following facts are derived from the PSR. The accuracy and reliability was not
 22 objected to by the government. *See* PSR Objections.

23 ⁶ USPO Rec. at 3.

24 ⁷ *Id.*

25 ⁸ The Individuals with Disabilities Education Act (IDEA); Section 504 of the
 26 Rehabilitation Act; and Title II of the Americans with Disabilities Act (ADA).

⁹ <https://www.k12.wa.us/student-success/special-education/family-engagement-and-guidance/eligibility-special-education> (last accessed Dec. 6, 2022).

¹⁰ <https://www.dcyf.wa.gov/services/child-welfare-system/cps> (last accessed Dec. 6, 2022).

¹¹ *See* RCW 26.44.030 (Reports—Duty and authority to make).

nexus between negative behavioral experiences and adverse health outcomes.¹² Those negative behavioral experiences and adverse outcomes exist in this case.

As also reported by the USPO, during his developmental years, his family moved “approximately ten”¹³ times because of his father’s actions, instability that made it impossible for him to succeed as an adult.¹⁴ Even after his father’s death, other family members “introduced more chaos”¹⁵ and trauma into his life by allowing “strangers” to subject the family to abuse. It is no small wonder that Joey, an intellectually disabled person who is on the spectrum, has been “calling crisis lines and suicide hot lines for eight or nine years”¹⁶ and suffers from severe “post-traumatic stress disorder,” all of which has caused him to disassociate from the real world.¹⁷ A renowned expert, whose opinions have been explicitly endorsed by the United States Attorney, states:

Dissociation is the essence of trauma...Flashbacks and reliving are in some ways worse than the trauma itself...If elements of the trauma are replayed again and again, the accompanying stress hormones engrave those memories ever more deeply in the mind. Ordinary, day-to-day events become less and less compelling. Not being able to deeply take in what is going on around them makes it impossible to feel fully alive. It becomes harder to feel the joys and aggravations of ordinary life, harder to concentrate on the tasks at hand. Not being fully alive in the present keeps them more firmly imprisoned in the past.

van der Kolk M.D., Bessel, *The Body Keeps the Score*, Viking Publications, 2014, at 66–67.¹⁸

¹² PSR ¶¶ 85–87.

¹³ USPO Rec. at 3.

¹⁴ *Moving Repeatedly in Childhood Associated with Poorer Quality of Life Years Later*, American Psychological Association, 2010, <https://www.apa.org/news/press/releases/2010/06/moving-well-being>.

¹⁵ USPO Rec. at 3.

¹⁶ PSR ¶ 78.

¹⁷ *Id.*

¹⁸ *United States v. Antonio Diego Brugnoli-Baskin*, No. MJ22-499-MAT-LK (W.D. Wash.), Dkt. 27, United States Motion to Appeal Release Order (dated Oct. 25, 2022) at 10; *see also id.*, 2022 WL 16636429 *6 (same) (King L.).

1 Joey disassociated from reality because of all kinds of abuse: “For years,
 2 Mr. George experienced his family mocking him and calling him derogatory names.”¹⁹
 3 The Probation Office reports that “[t]hey mocked him because he was ‘different.’ They
 4 called him ‘faggot’ and ‘retard,’”²⁰ and his cousins would rub their genitals on him.”²¹

5 **C. The Remaining 18 U.S.C. § 3553(a) Factors Support a Sentence of**
 6 **Time Served.**

7 In arriving at a sentence that is “sufficient but not greater than necessary” to
 8 comply with the purposes of federal sentencing, this Court needs to consider a number
 9 of other factors, including: (1) the nature and circumstances of the offense; and (2) the
 10 need for the sentence imposed (a) to reflect the seriousness of the offense, to promote
 11 respect for the law, and to provide just punishment for the offense, (b) to afford
 12 adequate deterrence to criminal conduct, and (c) to protect the public from further
 13 crimes of the defendant. 18 U.S.C. § 3553(a). The following is a discussion of how
 14 those factors, the most relevant ones here other than his personal history and
 15 characteristics discussed above, support a sentence of 12 months and a day.

16 **1. The Nature and Circumstances of the Offense**

17 The nature and circumstances of the offense weigh strongly in favor of a
 18 sentence of 12 months and a day. Given the lifelong conditions he endured, Joey, an
 19 intellectually disabled person with ASD, “disassociat[ed]” into his room, into a world
 20 of addiction, a world untethered from reality. To provide the Court some context as to
 21 what this disassociated world actually looks like for persons with disabilities like Joey,

22
 23 ¹⁹ USPO Rec. at 3.

24 ²⁰ The term is used here to provide accurate context of Joey’s life experiences. The
 25 correct and appropriate term is “intellectually disabled,” a term which replaced “mental
 26 retardation,” in 2010 following passage of Rosa’s Law. *See* Public Law 111-256
 available at <https://www.govinfo.gov/content/pkg/PLAW-111publ256/pdf/PLAW-111publ256.pdf> (last accessed Dec. 7, 2022).

²¹ PSR ¶ 67.

the following is a picture of Joey's room at the time of his arrest, a picture never independently obtained by the government:



As the USPO reported early on in this case, like a child, Joey collects “Hot Wheels and Star Wars memorabilia,” which he places on display in his bedroom.²²

There were initial indications that Joey was living with persons who themselves harbored racist beliefs. “Mr. John noted that Mr. George is a good kid, not violent, and not causing trouble, like *some minorities*.”²³ Those indications were confirmed by the USPO: “Because of his culture, he grew up in a racist environment, and was ‘raised to hate.’ He said he was ‘saying the N-word at 2 or 3 years old.’”²⁴ He was not only abused but taught racist ideology by those tasked with raising him and caring for him.

²² Pretrial Services Report at 3 (dated July 25, 2022).

²³ *Id.* at 2.

²⁴ PSR ¶ 70.

As reported by the USPO, he further disassociated from reality by watching “Fox News ten hours a day.”²⁵ As Nicholas Confessore of the New York Times reports, representatives from the Fox News channel traffic in ideology once “caged in a dark corner of American life.”²⁶ These so called “dog whistles” were perpetuated by the news channel as it created artificial tension and division between the legitimate and abhorrent harms suffered by both Asian and Black persons in the United States. Joey bought into this false equivalency, a false narrative that motivated him to make the phone calls in this case.

The following is one illustrative example of what Joey was hearing on Fox News during this period of time: “This may be a lot of things, this moment we are living through, but it is definitely not about black lives and remember that when they come for you, and at this rate, they will.”²⁷ To add to his confusion, Joey’s mother had previously been “a victim of an assault” by a person of color.²⁸

Against the backdrop of Joey’s individual personal history, experiences, and characteristics, beginning in September 2021, and continuing until law enforcement intervention in July 2022, he made racially motivated threats via telephone to several businesses. In September 2021, Joey called a marijuana dispensary in Maryland, and threatened to kill all of the African American people at the business. The police officer

²⁵ PSR ¶ 24.

²⁶ <https://www.npr.org/2022/05/12/1098488908/has-tucker-carlson-created-the-most-racist-show-in-the-history-of-cable-news> (last accessed Dec. 7, 2022); *see also* Confessore, Nicholas, *How Tucker Carlson Stoked White Fear to Conquer Cable*, the New York Times, April 30, 2022, available at <https://www.nytimes.com/2022/04/30/us/tucker-carlson-gop-republican-party.html> (last accessed Dec. 7, 2022).

²⁷ <https://www.washingtonpost.com/nation/2020/06/09/fox-black-lives-carlson/> (last accessed Dec. 7, 2022).

²⁸ USPO Rec. at 5.

1 called Joey back and talked to him about what he said, observing he "...was mentally
2 off or just vengeful..."²⁹

3 On the same day, Joey called a Denny's restaurant in Connecticut and made
4 similar threats. The local prosecutor involved with investigating that case concluded
5 that "the comments George made did not constitute a true threat according to statute."³⁰

6 In January 2022, Joey called a marijuana dispensary in Seattle, Washington, and
7 told the employee who answered that he (Joey) carried a gun and would go to the
8 business and shoot any Black people who were there at the time of his arrival.

9 In May 2022, Joey called a Shari's restaurant and threatened to shoot any Black
10 or Hispanic patrons in the restaurant if it did not close within 20 minutes. When law
11 enforcement called Joey back and talked to him and investigated the matter, they
12 assessed that "there was no imminent danger or threat to life."³¹

13 In July 2022, Joey called a Tops grocery store in Buffalo, New York, and
14 threatened to shoot and kill all of the Black people in the store, including the children
15 and babies. This threat was made two months after the racially motivated shooting at a
16 Tops grocery store in Buffalo, in which ten Black people were shot and killed. It did not
17 involve the same store. The person who took the call felt threatened, but also reported
18 "to me he seemed like a religious nut," and "I was talking to him for so long that I
19 expected it to be a joke."³² The recipient also corroborated Joey's report about the
20 influences of Fox News on his thinking: "He told me you should know who [Christina
21 Lee] is, she's famous. She gotten beat up by a black guy and nobody did anything. He
22
23

24 ²⁹ Dkt. 36-3, Maryland Police Report.

25 ³⁰ Dkt. 36-4, Connecticut Police Report.

26 ³¹ Dkt. 36 at 4, FBI Threat Assessment.

³² Dkt. 36-1, Buffalo Police Report; *see also* <https://www.foxnews.com/media/nyc-liberal-da-alvin-bragg-christina-yuna-lee-murder-safir> (last accessed Dec. 7, 2022).

1 said you don't know who that is because the media wants to sweep all the Asian hate
2 crimes under the rug." *Id.*

3 After factual, constitutional, and mental health issues were raised with respect to
4 these offenses, the United States Attorney offered and agreed to enter into a plea
5 agreement whereby they would dismiss Counts 2, 3, and 4 under the Indictment in
6 exchange for Joey pleading to two offenses.³³ The two offenses did not involve actual
7 violence; Joey has never attempted to obtain a firearm nor attempted to leave Lynwood
8 to travel by car³⁴ or plane, and his actions are described by the USPO as "not
9 sophisticated" and "impulsive."³⁵ The USPO interviewed a family member early on
10 who "described [Joey] as a smart, but 'childlike' adult" during the time when these
11 offenses were committed.³⁶ At the time of the offense, he was receiving mental health
12 treatment for PTSD. The provider reports: "at no point during my interactions with him
13 did I witness any behaviors or comments that were concerning for Mr. George being a
14 danger to himself or others."³⁷ However, Joey stopped going to treatment "because it
15 was too difficult to attend appointments because he did not drive," and because
16 appointments were frequently canceled.³⁸

17 But once Joey sat down and spoke to his attorney, who happens to be a person of
18 color, and was provided perspective about his behavior, thinking, bad influences in his
19 life, and the impact the phone calls had on other persons of color, he felt "sick to [his]
20 stomach" when he realized what he had done.³⁹ He told the USPO the same thing: that
21 it was "overbearing and sickening to hear" what he did and how he scared, threatened,
22

23 ³³ Dkt. 41, Plea Agreement.

24 ³⁴ Joey has never had a driver's license.

25 ³⁵ USPO Rec. at 4.

26 ³⁶ Pretrial Services Report at 3.

³⁷ Exhibit 1, Letter from Provider (under seal).

³⁸ PSR ¶ 80.

³⁹ PSR ¶ 24.

1 and marginalized communities who had recently been subject to a mass shooting when
 2 he made these calls.⁴⁰ He is amenable to change but he needs guidance that takes into
 3 account his cognitive limitations.

4 **2. The Need for the Sentence Imposed to Reflect the Seriousness**
 5 **of the Offense, Promote Respect for the Law, and Provide Just**
 6 **Punishment for the Offense**

7 A sentence of 12 months and 1 day reflects the seriousness of the offense,
 8 promotes respect for the law, and provides just punishment for the offenses given the
 9 impact the statements had on individuals and businesses who received the calls. Joey
 10 surely frightened people when he made those calls, specifically Black people. When he
 11 called, he told the individuals he had a firearm, suggesting to them that he was serious,
 12 which scared them further. However, some of the individuals and businesses did not
 13 take the calls seriously because it was apparent that Joey may have had mental health
 14 issues or was not a serious threat, as reflected in witness accounts and law enforcement
 15 threat assessments. More important, it is undisputed by all that Joey’s unsophisticated
 16 actions were driven by his cognitive disabilities:

17 Dr. Freedman conducted intellectual and neurological testing, which
 18 estimated Mr. George’s “cognitive ability as being in the borderline range
 19 with a Full Scale IQ of 72.” Dr. Freedman’s evaluation indicated that
 20 “based on a reasonable degree of psychological certainty, Mr. George’s
 21 intellectual and functional limitations constitute a substantial disability
 22 which likely impaired his capacity to understand and control his actions.
 23 His specific expression of intellectual deficits and mental disease appears
 24 directly relevant to the issue of criminal responsibility and to the choice of
 25 punishment in this case.”

26 PSR ¶ 82.

 Sentencing Joey, an intellectual disabled person with ASD, to a prison sentence
 that does not account for his limitations—limitations he was born with—is not only an
 unjust punishment but also promotes disrespect for the law because it is contrary to

⁴⁰ *Id.*

society's recognition that persons like Joey must be protected by courts. Congress,⁴¹ the Supreme Court,⁴² and Washington law⁴³ require Courts and the government to recognize and consider the institutional and penological impacts on persons with disabilities. Indeed, the United States Attorney has an obligation to protect Joey given his status as disabled person.⁴⁴ Thus, in measuring a sentence that reflects the seriousness of the offense, promotes respect for the law, and provides just punishment, the Court should absolutely consider the fact that Joey made threatening calls to a marginalized community that had been terrorized by a mass-shooter. But the Court should also consider the fact that Joey, too, is part of a marginalized community in need of protection. A proper balancing of both these interests supports a sentence of 12 months and a day.

3. The Need to Deter and the Need to Protect the Public from Further Crimes

As the Probation Office acknowledges, "[d]eterrence is difficult to predict" because the conduct at issue is inextricably intertwined with Joey's upbringing and mental health issues.⁴⁵ The reason deterrence is difficult to predict is best described by the late Justice Stevens, who observed "[a]s to deterrence, the same cognitive and behavioral impairments that make [intellectually disabled] defendants less morally culpable also make it less likely that they can process the information of the possibility of [punishment] and, as a result, control their conduct based upon that information."⁴⁶

⁴¹ See H.R.10 - Civil Rights of Institutionalized Persons Act (CRIPA), available at <https://www.congress.gov/bill/96th-congress/house-bill/10> (last accessed Dec. 8, 2022); see also the Americans with Disabilities Act (ADA), available at <https://www.ada.gov/> (last accessed Dec. 8, 2022).

⁴² *Olmstead v. L.C.*, 527 U.S. 581 (1999); *Atkins v. Virginia*, 536 U.S. 304, 319 (2002).

⁴³ Chapter 388-823, Washington Administrative Code.

⁴⁴ 42 U.S.C. § 1997a; 42 U.S.C. § 12132.

⁴⁵ USPO Rec at 5.

⁴⁶ *Atkins*, 536 U.S. at 305.

1 Joey's ability to process insight and understanding as to his actions is impeded by his
2 disabilities.

3 As to protecting the public, Joey has no criminal history; and history provides
4 the best evidence as to recidivism. The United States Sentencing Commission reports
5 that "[l]ess than one-third of Criminal History Category I offenders with zero points
6 were rearrested" after committing their first federal offense.⁴⁷ Joey is in his 30s, which
7 is another factor that indicates he is less prone to recommitting a crime. Importantly, the
8 Sentencing Commission does not take into account the fact that he will be supervised
9 by one of the top Probation Offices in the country or that he is intellectually disabled.
10 Dr. Freedman opines that recidivism concerns must take into account Joey's mental
11 status as well:

12 Dr. Freedman proposes the following treatment or intervention to reduce
13 a risk of recidivism in Mr. George's case: establish stable independent
14 living environment, case management services, treatment to address
inflexible thinking, addiction treatment, and medication management.

15 PSR ¶ 83. The Court should do the same in Joey's case.

16 **4. The Need for the Sentence to Provide the Needed Educational**
17 **or Vocational Training, Medical Care, or Other Correctional**
18 **Treatment in the Most Effective Manner**

19 Consistent with Dr. Freedman's recommendation, the Probation Office is
20 confident that it can supervise Joey in the community: "A three-year term of supervised
21 release will provide Mr. George with the correctional treatment he needs. During this
22 time, he will be closely monitored by United States Probation to ensure the ongoing
23 safety of the community."⁴⁸ "These interventions will reduce his risk of recidivism and
24 are necessary components of his rehabilitation."⁴⁹ Joey spoke at great length to the

25 ⁴⁷ <https://www.ussc.gov/research/research-reports/criminal-history-and-recidivism-federal-offenders> (last accessed Dec. 8, 2022).

26 ⁴⁸ USPO Rec. at 5.

⁴⁹ *Id.*

1 Probation Office about the offense. Also implicit in the Probation Office’s position as
 2 to supervision is the concern that Joey will suffer from unique harms given his
 3 intellectual disabilities.

4 In 2017, the Office of the Inspector General issued a report criticizing the
 5 Bureau of Prison’s restrictive housing for inmates with mental illness like Joey.⁵⁰ The
 6 Inspector General found that inmates with mental illness were house in single-cell
 7 confinement for long periods of time, isolated from other inmates and with limited
 8 human contact.⁵¹ Since the report was issued, the pandemic has had additional impacts
 9 on the Bureau of Prisons’ ability to house inmates leading to long-term lockdowns and
 10 denial of basic services. The prisons are still recovering from these setbacks
 11 independent of the findings of the Inspector General.

12 “While at FDC SeaTac, [Joey] has seen a psychologist once a month, which he
 13 finds beneficial,” but once a month is nowhere near the level of care he needs to receive
 14 correctional treatment in the most effective manner.⁵² This is particularly true because
 15 he is intellectually disabled and thus vulnerable to being taken of advantage of by
 16 others—like those who have taken advantage of him since childhood and taught him
 17 terrible things about minority communities.

18 An equally damaging aspect of incarceration for Joey has to do with his ASD:
 19 “his significant deficits in social-emotional reciprocity, reactivity to sensory input, and
 20 highly restricted and fixated interests of abnormal intensity,” and his sensitivity to touch
 21 and light. Prison is like a boot camp. Prisoners are told when to get up; they are told to
 22 get up early, and told to do so loudly. They are ordered to stay in lines and when to get
 23 food, and the lights are not turned out. Prison is a hostile place, a place where prisoners
 24 segregate themselves by race. There is always a risk of violence and uncertainty in

25 ⁵⁰ <https://oig.justice.gov/reports/2017/e1705.pdf> (last accessed Dec. 8, 2022).

26 ⁵¹ *Id.*

⁵² PSR ¶ 80.

1 prison. Each day Joey has spent in prison, he has suffered a pain that most people do
2 not understand. The punishment that is imposed on him should acknowledge that Joey
3 has suffered and will continue to suffer a unique pain in prison. That pain is not
4 effective in helping him understand what he did wrong. That pain is an arbitrary and
5 unnecessary pain.

6 **III. CONCLUSION**

7 Before concluding, a few observations need to be made. First, the government
8 states that Joey “*appears* to have both intellectual and emotional challenges,” as though
9 these conditions are afterthoughts. Despite having received a copy of Joey’s assessment
10 well in advance of the draft presentencing report, the government never raised any
11 objections as to its reliability either directly to defense counsel or the Probation Office
12 under Federal Rule of Criminal Procedure 32. The findings were adopted by the
13 Probation Office because, after they conducted an independent investigation of this
14 matter, they reached the same results as reflected in their sentencing recommendation.
15 It is telling that the government provides the Court a copy of the transcript for Joey’s
16 interview but not the video, because the video shows that Joey exhibits symptoms
17 consistent with individuals who are intellectually disabled and have ASD. These are the
18 symptoms that were relied on by Dr. Freedman and the Probation Office to reach their
19 own independent conclusions, conclusions that were never challenged by the
20 government.

21 Second, early on in this case, the media mischaracterized Joey by putting a
22 picture of him in the press suggestive of Joey wearing military fatigues:

23 //

24 //



This was a misleading suggestion. Joey was wearing a Super Mario Brothers t-shirt because he spends a great deal of time in his room, which is covered with toys on the wall, playing video games. The defense makes this point because it is likely that the

media will take the transcript that the government attached to its sentencing memorandum and further mischaracterize an individual with disabilities like it has done in the past by taking snippets of statements from that transcript and using them as headlines without context or understanding. Such mischaracterizations cause collateral harm to persons like Joey whose names will be forever memorialized on the internet.

For all the reasons provided in this memorandum, Joey respectfully asks the Court to impose a sentence of 12 months and 1 day, to be followed by 3 years of supervised release

DATED this 9th day of December 2022.

Respectfully submitted,

s/ Mohammad Ali Hamoudi
Assistant Federal Public Defender
Attorney for Joey George